

UNITED STATES DISTRICT COURT-DISTRICT OF NEW HAMPSHIRE  
[via transfer designation to UNITED STATES DISTRICT COURT- DISTRICT OF MAINE]  
CIVIL ACTION NO: 1:24-cv-00360  
ANDRE BISASOR, et. al. v. NEW HAMPSHIRE JUDICIAL BRANCH, et. al

**PLAINTIFFS' [EMERGENCY] MOTION TO EXTEND TIME TO FILE MOTION FOR  
RECONSIDERATION OF/OBJECTION TO MAGISTRATE'S 6-24-25 ORDER ON MOTION  
TO CLARIFY AND TO FILE MOTION FOR RECONSIDERATION OF/OBJECTION TO  
MAGISTRATE'S 4-8-25 R&R**

1. Plaintiffs respectfully move the Court for an extension of time to file motion for reconsideration of/objection, to the Magistrate Judge's 6-24-25 order on motion to clarify, with deadline of 7-8-25, and to the 4-8-25 report and recommendation (R&R), with deadline of 7-15-25. Grounds are as follows:
2. The 6-24-25 order has an automatic 14 day deadline to object to it which is 7-8-25. This is by tomorrow.
3. The 6-24-25 order gave only 3 weeks to file an objection to the R& R, which is 7-15-25.
4. There was just a long holiday weekend for Independence Day 2025.
5. The plaintiffs need time to object to the order on clarification.
6. The plaintiffs need time to object to the R&R.
7. The plaintiffs need time to amend the complaint.
8. NB: This is filed as an emergency because the deadlines expire on 7-8-25 on 7-15-25, which is today and 7 days, respectively. Therefore, time is of the essence.
9. Plaintiff will not be able to meet these deadlines.
10. This is due a confluence of factors including due to recently-diagnosed medical condition. See accompanying sealed documentation filed today with the court.
11. Further points are as follows.
12. Plaintiffs file this request in light of ongoing procedural uncertainty and the Court's denial of Plaintiff's 5-14-25 motion to clarify. Plaintiffs would like to move to reconsider that order but need time to do so.
13. Also, in the 6-24-25 denial of the motion to clarify, the Court did not address the distinction between filing a motion for reconsideration, an objection to the R&R and an amended complaint.

14. Plaintiffs believe that an extension is warranted and appropriate under these circumstances, particularly because the issues raised in the motion to clarify are directly relevant to the scope, timing, and nature of any objection or motion for reconsideration or amended complaint that might be filed.
15. The R&R recommends dismissal of the entire action for lack of subject matter jurisdiction unless Plaintiffs file an amended complaint that states a claim within the Court's jurisdiction, but it does not specify what amendments are required, nor does it address several claims and the defendants that are distinct from the state court judgments at issue<sup>1</sup>, among other things as stated in the motion to clarify. Plaintiff's motion to clarify was filed precisely to seek guidance on these points. But the Court has not provided any clarification or guidance on these critical issues, and as a result, Plaintiff is unable to determine how to proceed with an objection or amendment in a manner consistent with the Court's expectations and the requirements of due process.
16. Plaintiffs reasonably would like to file a motion to reconsider the denial of the motion to clarify. However, if that is denied, the plaintiffs would like to file an objection to the motion to clarify. Then if those are denied, plaintiffs would then like to file a motion to reconsider the R&R. And if that is denied, then plaintiffs would like to file an objection to the R&R. Plaintiffs would also like to file an amended complaint but are not sure if they are required to file such at the same time as the reconsideration of the R&R or the objection to the R&R. Either way, I need time to amend the 78 page complaint, which this court knows requires a lot of time and effort to review, much less to amend. This is an enormously complex task and requires a lot of careful research, analysis and writing, separate from the research and analysis and writing to be done for a reconsideration and an objection to the R&R. This is further compounded by the fact that the court has

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<sup>1</sup> It should be noted also that at the time of the filing of the complaint in October 2024, there was not any final state court judgment in state court, as the matter was still under review in state court without any final state court judgment entered, and thus the complaint, as of when it was filed, could not have been seeking to overturn any state court judgment. This court should not anachronistically use outside events that may occur later or subsequent to the complaint, against the complaint, when those facts or events were not pled in the complaint. The court should treat the complaint, as of the time it was filed, to determine jurisdiction. Conversely, either way, the plaintiffs have, in the motion to clarify, pointed out that the even subsequent events still do not render any state court judgment final.

provided no guidance or specifics in its R&R, but only more so general points declaring the claims to be outside the jurisdiction of the federal court.

17. Plaintiffs respectfully request that the Court extend the deadline for filing an objection to the R&R, as well as any related motion for reconsideration or amendment to the complaint.
18. The plaintiffs ask for at least 30 days extension for both deadlines.
19. This is reasonable since it appears that the court itself required a lot of time to review and issue a ruling on the motion to clarify, as well as on the R&R, and in light of the length and/or complexity of the order on the motion to clarify, and the R&R, in the context of the 78 page complaint, and to also prepare an amended complaint, and an objection or a motion for reconsideration.
20. Granting this extension will serve the interests of justice, and avoid prejudice to Plaintiffs, and would ensure that we have a fair opportunity to present our case.
21. We respectfully submit that there is good cause for granting this extension, as noted above.
22. For the foregoing reasons, Plaintiffs respectfully requests that the Court grant an extension of time to file an objection to the Magistrate Judge's order on clarification and on the R&R, as well as any related motion for reconsideration or amendment of the complaint, and such other relief deemed just and proper.

Respectfully submitted,  
/s/ Andre Bisasor  
Andre Bisasor

/s/ Natalie Anderson  
Natalie Anderson

Dated: July 8, 2025